

<u>No.</u>	<u>General Comment</u>
1	There are several typographical errors throughout the document. Please address for the next version. <b><i>Response: The typographical errors will be corrected.</i></b>

<u>No.</u>	<u>Worksheet No./ Page No.</u>	<u>Specific Comments</u>
1	Section 1.3	The monitoring plan focuses on impacts associated with the dredged material, itself. Please mention where consideration was made for the emissions of the heavy equipment to be utilized during the removal action.  <b><i>Response: The potential to emit (PtE) calculations did consider the potential emissions from equipment and the calculated results were below all permitting thresholds established by the Department.</i></b>
2	Page 5, Section 3.1.2	This section states that Mobile #1 “will be moved to pre-determined locations throughout the park as well as at random locations as needed.” Please clarify under what conditions these additional “random locations” are needed.  <b><i>Response: The random locations are meant to address potential complaints from park workers, recreational users and residents as needed.</i></b>
3	Page 7, Section 3.3	Given the proposed rotating schedule of COPC particulate analysis, consideration should be made to modify the plan in the event of a warning or action level exceedance. Please clarify and revise, as necessary.  <b><i>Response: COPC particulate analysis is not real-time. The samples will be collected and take several days for analysis and reporting. If an exceedance occurs for a particular parameter then that parameter will be analyzed for several days in a row before returning to the rotating sampling scheme/schedule.</i></b>
4	Page 8, Table 3-1, Particulate and Mercury	For particulate collection the table needs to indicate the smallest particle size that will be captured by the filter.  <b><i>Response: The smallest particle that will be captured is PM10 (10 micrometers in diameter or less). This information will be added to the table.</i></b>
5	Page 8, Table 3-1, Mercury	The filter described in this sampling approach will not capture the level of contamination associated with mercury vapor. It is recommended that an appropriate mercury vapor absorbent be added to the sample train to monitor the total impact from mercury that may occur during the removal action.  <b><i>Response: Mercury concentrations collected during the RM 10.9 characterization became part of the input for the potential to emit calculations that were performed and provided to NJDEP. The potential emissions for mercury did not exceed the NJDEP threshold reporting limit. It is reasonable to conclude based on these calculations that there will be no mercury vapor emissions that need to be monitored during the Removal Action.</i></b>

6	Page 10, Section 3.7.1	<p>This section states that the dredging duration is anticipated to be less than 60 days, while other sections of the report refer to an anticipated duration of 60 to 90 days. Please clarify.</p> <p><b>Response:</b> <i>A timeframe needed to be assumed for the risk-based calculations for the particulate action limits. The dredging is planned to only require 60-days but just to be conservative in case dredging takes longer, CPG conservatively assumed 90-days of activity for these calculations so there wouldn't be an issue about the appropriateness of the action level if the dredging goes beyond 60-days.</i></p>
7	Page 11, Section 3.7.3	<p>Is the reference to "Monitoring Location Section" intended to reference Section 3.1 of the Plan? If so, please add the section number.</p> <p><b>Response:</b> <i>Yes, the "Monitoring Location Section" will be deleted and will reference Section 3.1.</i></p>
8	Page 12, Table 4-1	<p>How were the warning and action levels determined? Please provide the basis and justification for the selection of these concentrations.</p> <p><b>Response:</b> <i>Usually the action level is set to the parameter that is the most toxic and requires the most protection. In the case of VOCs, the levels associated with this Removal Action are so low that none of the usual drivers such as benzene or vinyl chloride have been detected in the RM 10.9 sediment. It is difficult to calculate a risk based action level if there is very little potential for vapors due to either extremely low concentrations or no detections. The 5 ppm is based on other sediment type projects where VOCs are not the primary contaminant of concern and are present at very low levels.</i></p> <p><b>The dust action level is based on the EPA ambient air standard (Dust NAAQS, 2008. National Ambient Air Quality Standards).</b></p> <p><b>Based on the historical data the likelihood of hydrogen sulfide emission is low, therefore the action level was set at a level just above the odor threshold, but below a health concern level. The hydrogen sulfide action level will be decreased from 1 ppm to 0.02 ppm and a warning level decreased from 0.1 ppm to 0.01 ppm per NJDEP suggestion. (See NJDEP Comment # 13)</b></p>
9	Page 13, Table 4-2	<p>a. If corrective actions are implemented upon exceedance of a warning level and concentrations continue to rise, such that an action level is exceeded, what is the justification for not implementing work stoppage? Please clarify and revise, as necessary.</p> <p><b>Response:</b> <i>This is not real-time monitoring so the event will have passed by the time the data are available. If upon follow-up sampling action levels are exceeded, then consideration for a work stoppage will be discussed with the USEPA.</i></p> <p>b. Please adjust Table 4-2 headers on page 14, they shifted.</p> <p><b>Response:</b> <i>Headers will be adjusted.</i></p>

10	Page 15, Section 4.5	<p>What is the intent of the 15-minute limitation to restore monitoring levels below the action value? Please clarify what happens if this time constraint is not met.</p> <p><b>Response: The 15-minute timeframe is a minimum that operations must be suspended. If the action level does not decrease below the action level then operations will remain suspended unless a non-operational reason for the exceedance is identified.</b></p>
11	Page 18, Figure 1	<p>Please define the asterisk associated with DW #3*, as shown on this figure.</p> <p><b>Response: The asterisk means that DW#3 is not an air monitoring station until dredging in the northern area is complete and the equipment from station DW#1 is moved to the DW#3 location.</b></p>
12	Page 9, Table 3-2	<p>Recommend that Hydrogen Sulfide is monitored continuously, not just “if odor is detected”.</p> <p><b>Response: Hydrogen sulfide will be monitored continuously and data logged.</b></p>
13	Page 14, Table 4-2	<p>Two action levels for each of three <u>sampling</u> parameters (See pages 13 &amp; 14). All six of them say, “Notify EPA within 24 hours of receipt of analytical data.” Each of these actions should include the statement, “and adjust real-time action levels if needed.”</p> <p><b>Response: Table 4-2 is for the particulate sampling which is not a real-time monitoring parameter i.e. data are not available until laboratory analysis of the 24-hour composite particulate sample is complete, which is expected to take 5 days. The action level is a human health risk-based level based on potential exposure over 90-days, therefore any single value above that limit does not need to be responded to “in real-time”. If the human health risk-based action level is exceeded, several days worth of particulate sampling for the specific parameter will be conducted to see if conditions continue that produce the exceedance. The real-time dust monitoring data will be reviewed to help evaluate the potential cause of the particulate exceedance.</b></p>
14	Appendix A, SOP No. KNOX-MT-009, Section 1.3	<p>The method requires sampling in accord with Methods #29, D6784-02 and 0060. These sampling methods are not provided as part of this SOP and may differ from those described in the air monitoring plan. The Sampling plan and SOPs must show that one or more of these methods allow air sampling are as described in Table 3-1 of the sampling plan.</p> <p><b>Response: Method 29 is for fixed stack sampling and inappropriate for ambient air procedures. The mercury target analyte will be collected as part of the PM10 method for particulate matter. Per the contract laboratory procedure a portion of the filter media will be digested using Test American Method KNOX-IP-0003, Revision 5 and analysis by Method 7470A to provide definitive data. The Perimeter Air Monitoring Plan will be revised to reflect this correction in regards to this procedure</b></p>